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GPI, LLC

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

GPI, LLC,

Plaintiff,

v.

DOGGONE GEESE, INC. AND CATHY P.
BENEDICT

Defendants.

Civil Action No. 3:18-cv-5122 (FLW) (TJB)

Document electronically filed

**DECLARATION OF CINDY
RANNEBERGER IN SUPPORT OF
APPLICATION OT SHOW CAUSE
PURSUANT TO FED. R. CIV. PRO. 65**

CINDY RANNEBERGER, of full age declares:

1. I am an individual residing in Frederick, Maryland.
2. As set forth below, I have been affiliated with Geese Police, LLC ("GPI") since 2002.
3. I was employed by Cathy Benedict ("Benedict") and then Geese Police of VA & MD for two years from 2002 until 2005.
4. Then on August 8, 2005, I bought the Maryland accounts from Benedict.. I paid Benedict approximately \$120,000.00 for her accounts. I do business as Central Maryland Geese Police.

5. My franchise territory consists of Montgomery, Carroll, Howard and Frederick Counties in Maryland, and I have not added to that territory since I purchased it in 2005.
6. I began servicing approximately twelve (12) customer accounts which I had purchased from Benedict.
7. I have grown my business to service anywhere from 25-40 clients depending upon the season of the year.
8. My Franchise Agreement clearly defines my territory and what I can and cannot do as a franchisee. For example, as a franchisee, I am not permitted to sell trained goose control dogs.
9. As an active franchisee of GPI, Benedict's activities worry me.
10. If Benedict is permitted to operate her new company, I worry that Benedict will go into direct competition with me, and will try to badmouth my business or GPI in order to retake my clients that she knew from twelve (12) years ago. When she was a franchisee, Benedict had a history of not staying in her own territory.
11. A Geese Police franchise operates at a higher level of service than other goose control companies. Benedict, however, is trained in the Geese Police system and knows the Geese Police trade secrets. Benedict knows how we do business, and how we price our services so having her as a competitor will harm my franchise and other franchisees.
12. If Benedict sells trained goose control dogs into my territory, she will be taking potential or existing clients from me because some property owners choose to purchase trained goose control dogs instead of contracting with a company like Geese Police.

Dated: May 8 2018



Cindy Ranneberger